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UBIQUITI NETWORKS INTERNATIONAL LIMITED

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SYNOPSYS, INC.,

Plaintiff,

v.

UBIQUITI NETWORKS, INC., UBIQUITI
NETWORKS INTERNATIONAL LIMITED,
CHING-HAN TSAI, and DOES 1-20,
inclusive

Defendants.

Case No. 5:17-cv-00561-WHO

**REPLY DECLARATION OF
CHING-HAN TSAI IN SUPPORT
OF DEFENDANT UBIQUITI
NETWORKS INTERNATIONAL
LIMITED (UNIL)'S MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION
PURSUANT TO RULE 12(b)(2)**

Date: May 17, 2017

Time: 2:00 p.m.

Place: Courtroom 2, 17th Floor

Judge: Honorable William H. Orrick

1 I, CHING-HAN TSAI, declare as follows:

2 1. My name is Ching-Han Tsai and I am employed by Ubiquiti Networks, Inc.,
3 (“Ubiquiti”). I submit this reply declaration in support of UNIL’s Reply Brief in Support of
4 UNIL’s Motion to Dismiss for Lack of Personal Jurisdiction Pursuant to Rule 12(b)(2). I have
5 personal knowledge of the facts contained in this declaration.

6 2. I am one of only two California-based Ubiquiti employees that, at all relevant
7 times, worked on semiconductor chip design activities with employees of Ubiquiti Networks
8 International Limited (“UNIL”). My colleague, Sheng-Feng Wang, is the other Ubiquiti
9 employee involved in this work. I am the lead engineer on the semiconductor chip design
10 activities, and am familiar with who is working on them. To the best of my knowledge, no other
11 California-based Ubiquiti employees interacted with or had reason to interact with employees of
12 UNIL in connection with the subject matter alleged in Synopsys’ lawsuit.

13 3. While present in California, I never received any transmission from UNIL
14 employees containing unauthorized license keys or unauthorized copies of Synopsys’ software.
15 To the best of my knowledge, no UNIL employee transmitted to any Ubiquiti employee in
16 California unauthorized license keys or unauthorized copies of Synopsys’ software.

17 4. In my April 11, 2017 Declaration, I stated that “Mr. Bergman referred me to Tony
18 Huang from Synopsys Taiwan Co., Ltd. (“Synopsys Taiwan”) in Taiwan.” (ECF No. 35-1 ¶ 6.) I
19 understand that Synopsys has objected to this statement on the following basis: “Lack of
20 Foundation: Tsai is not qualified to speak to which Synopsys entity Mr. Huang works for, or
21 where Mr. Huang resides.” (ECF No. 39 at 14:2-3.) I also understand that Synopsys has made a
22 similar objection to a similar statement I made about Victor Chen’s status as a Synopsys Taiwan
23 employee. (*Id.* at 14:12-15.) My understanding of the entity that Mr. Huang and Mr. Chen work
24 for, and where they reside, derives from my personal interactions with them. For example, the
25 signature block that Mr. Huang used on his emails to me stated that he worked for “Synopsys
26 Taiwan Limited.” (**Exhibit A** hereto.) Similarly, Victor Chen maintains a public LinkedIn
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1 profile listing himself as a Synopsys employee located in “New Taipei City, Taiwan.” (**Exhibit B**
2 hereto.) Further, I met with Mr. Huang and Mr. Chen at the UNIL offices in Taipei.

3 5. I understand that Synopsys has argued that “UNIL *knowingly* copied software and
4 documentation from Synopsys servers located in California.” (ECF No. 39 at 9:23-26 (emphasis
5 in original).) However, in my experience, a user of a company’s file download website may not
6 know where that company’s computer servers are located. Synopsys, for example, apparently has
7 “engaged with Amazon.com” for certain data center resources.¹ It is well known that Amazon
8 maintains server data centers in various locations around the world.²

9
10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct.

12 Executed this 2nd day of May, 2017, in Taipei, Taiwan.

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16 By: 
17 CHING-HAN TSAI

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27 ¹ http://www.eetimes.com/document.asp?doc_id=1259080 (last accessed May 2, 2017).

28 ² <https://aws.amazon.com/about-aws/global-infrastructure/> (last accessed May 2, 2017).